

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Earnestine Weathersby, Debtor

**Case No. 24-01114-KMS
CHAPTER 13**

APPLICATION TO EMPLOY SPECIAL COUNSEL

COMES NOW, Debtor (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §329, files this Application to Employ Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Debtor represents that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s EEOC claim.
2. That the Debtor desires to employ Watson & Norris, PLLC to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Watson & Norris, PLLC has attached his affidavit hereto, stating that the attorney is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Watson & Norris, PLLC will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Watson & Norris, PLLC as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Earnestine Weathersby, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on July 25, 2025, to:

By USPS First Class Mail:

Debtor

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.